

1 ROBERT T. EGLET, ESQ.
2 Nevada Bar No. 3402
3 ROBERT M. ADAMS, ESQ.
4 Nevada Bar No. 6551
5 ERICA D. ENTSMINGER, ESQ.
6 Nevada Bar No. 7432
7 **EGLET ADAMS**
8 400 S. 7th Street, 4th Floor
9 Las Vegas, NV 89101
10 Tel.: (702) 450-5400
11 Fax: (702) 450-5451
12 E-Mail: eservice@egletlaw.com

-and-

10 STEVEN B. WOLFSON, ESQ.
11 Nevada Bar No. 1565
12 District Attorney
13 200 E. Lewis Ave
14 Las Vegas, NV 89101
15 Tel.: 702-671-2700
16 Email: steven.wolfson@clarkcountyda.com
Counsel for Plaintiff Clark County

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

18 CLARK COUNTY,)
19 Plaintiff,) Case No: 2:19-cv-01616-KJD-VCF
20 v.)
21 PURDUE PHARMA, L.P.; PURDUE)
22 PHARMA, INC.; THE PURDUE)
23 FREDERICK COMPANY, INC. d/b/a THE)
PURDUE FREDERICK COMPANY, INC.;)
24 PURDUE PHARMACEUTICALS, L.P.;)
RICHARD S. SACKLER; JONATHAN D.)
25 SACKLER, MORTIMER D.A. SACKLER;)
KATHE A. SACKLER; ILENE SACKLER)
26 LEFCOURT; DAVID A. SACKLER;)
BEVERLY SACKLER; THERESA)
27 SACKLER; PLP ASSOCIATES HOLDINGS)
L.P.; ROSEBAY MEDICAL COMPANY)
28)
NOTICE OF VOLUNTARY DIS-)
OF ALL CLAIMS AGAINST E-)
SCRIPTS HOLDING COMPAN-)
EXPRESS SCRIPTS, INC. V)
PREJUDICE)

1 L.P.; BEACON COMPANY; TEVA)
2 PHARMACEUTICALS USA, INC.;)
3 CEPHALON, INC.; ENDO HEALTH)
4 SOLUTIONS INC.; ENDO)
5 PHARMACEUTICALS, INC.; PAR)
6 PHARMACEUTICAL, INC.; PAR)
7 PHARMACEUTICAL COMPANIES, INC.;)
8 ALLERGAN INC.; ALLERGAN USA INC.;)
9 ACTAVIS, INC. f/k/a WATSON)
10 PHARMACEUTICALS, INC.; WATSON)
11 LABORATORIES, INC.; INSYS)
12 THERAPEUTICS, INC.; JOHN KAPOOR;)
13 RICHARD M. SIMON; SUNRISE LEE;)
14 JOSEPH A. ROWAN; MICHAEL J. GURRY;)
15 MICHAEL BABICH; ALEC BURLAKOFF;)
16 MALLINCKRODT LLC; SPECGX LLC;)
17 ACTAVIS LLC; AND ACTAVIS PHARMA,)
18 INC. f/k/a WATSON PHARMA, INC.;)
19 AMERISOURCEBERGEN DRUG)
20 CORPORATION; CARDINAL HEALTH,)
21 INC.; CARDINAL HEALTH 6 INC.;)
22 CARDINAL HEALTH TECHNOLOGIES)
23 LLC; CARDINAL HEALTH 414 LLC;)
24 CARDINAL HEALTH 200 LLC;)
25 MCKESSON CORPORATION;)
26 WALGREENS BOOTS ALLIANCE, INC.;)
27 WALGREEN CO.; WALGREEN EASTERN)
28 CO., INC.; WALMART INC.; CVS HEALTH)
CORPORATION; CVS PHARMACY, INC.;)
CVS INDIANA L.L.C.; CVS RX SERVICES,)
INC.; CVS TENNESSEE DISTRIBUTION,)
L.L.C.; MASTERS PHARMACEUTICAL,)
LLC f/k/a MASTERS PHARMACEUTICAL,)
INC.; C & R PHARMACY d/b/a KEN'S)
PHARMACY f/k/a LAM'S PHARMACY,)
INC.; EXPRESS SCRIPTS HOLDING)
COMPANY; EXPRESS SCRIPTS, INC.;)
AIDA B MAXSAM; STEVEN A HOLPER)
MD; STEVEN A. HOLPER, M.D.,)
PROFESSIONAL CORPORATION;)
HOLPER OUT-PATIENTS MEDICAL)
CENTER, LTD.; DOES 1 through 100; ROE)
CORPORATIONS 1 through 100 and ZOE)
PHARMACIES 1 through 100, inclusive,)
Defendants.)

Pursuant to FRCP 41(a)(1) of the Federal Rules of Civil Procedure, Counsel for Plaintiff
1
Clark County hereby gives notice that Plaintiff is voluntarily dismissing its claims in the above-
2
captioned action against Defendants Express Scripts Holding Company and Express Scripts, Inc.
3
with prejudice. This notice of dismissal does not relate to the claims asserted by Plaintiff as to the
4
remaining Defendants.
5
6

Defendant Express Scripts Holding and Express Scripts, Inc. has not filed an answer or
7
responsive pleading to the Clark County Operative Third Amended Complaint. Thus, Clark
8
County files the instant Notice of Voluntary Dismiss with prejudice.
9
10

IT IS SO STIPULATED AND AGREED.

DATED this 13th day of September, 2019

EGLET ADAMS

ROBERT T. EGLET, Esq.
Nevada Bar No. 3402
ROBERT M. ADAMS, Esq.
Nevada Bar No. 6551
ERICA D. ENTSINGER, ESQ.
Nevada Bar No. 7432
400 S. 7th Street, 4th Floor
Las Vegas, NV 89101
Tel.: (702) 450-5400
Fax: (702) 450-5451
E-Mail eservice@egletlaw.com

STEVEN B. WOLFSON, ESQ.
Nevada Bar No. 1565
District Attorney
200 E. Lewis Ave
Las Vegas, NV 89101
Tel.: 702-671-2700
Email: steven.wolfson@clarkcountyda.com
Counsel for Plaintiff Clark County

1

2 **CERTIFICATE OF SERVICE**

3 Pursuant to F.R.C.P. 5(b), I hereby certify that I am an employee of EGLET ADAMS,
4 and on the 13th day of September, 2019, I did cause a true and correct copy of the foregoing
5 document **NOTICE OF VOLUNTARY DISMISSAL OF ALL CLAIMS AGAINST**
6 **EXPRESS SCRIPTS HOLDING COMPANY AND EXPRESS SCRIPTS, INC. WITH**
7 **PREJUDICE** to be filed and served electronically via the Court's CM/ECF system.

8

9

10 
11 An employee of EGLET ADAMS

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28